

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

DANIEL ANDERSEN,)	
)	
Plaintiff,)	16 cv 1963
)	
v.)	District Judge Kendall
)	
CITY OF CHICAGO, et al.)	
)	
Defendants.)	JURY TRIAL DEMANDED

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rules 5.8 and 26.2, Plaintiff Daniel Andersen, by his attorneys, respectfully requests an order granting Plaintiff permission to file “Plaintiff’s Response to Defendants’ Proffer to Defendants’ Proffer of ‘Plaintiff’s Bad Acts Towards Women’ (Dkt. 754)” under seal, stating as follows:

1. Plaintiff’s Response to this response, which are to be filed later today, contain confidential information subject to various confidentiality and protective orders in this case.
2. Accordingly, good cause exists to allow Plaintiff to file these documents under seal rather than publicly.
3. In compliance with Local Rules 5.8 and 26.2, Plaintiff: (a) will provisionally file exhibits electronically under seal after filing this motion; (b) will file electronically a public-record version of his motion and exhibit; and (c) now move this Court for leave to file the non-redacted version of his motion and any exhibits containing confidential information under seal.
4. Plaintiff requests leave to file the following response and corresponding exhibits under seal:

Plaintiff’s Response to Defendants’ Proffer to Defendants’ Proffer of “Plaintiff’s Bad Acts Towards Women” (Dkt. 754), and corresponding Exhibits A-E.

WHEREFORE, Plaintiff respectfully requests that the Court enter an order granting him permission to file the aforementioned response and exhibits under seal.

DATED: January 17, 2021

RESPECTFULLY SUBMITTED,

/s/ Josh Tepfer
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Josh Tepfer, an attorney, hereby certify that on January 17, 2021, I filed the foregoing Motion to For Leave to File Under Seal Instructions via the Court's CM/ECF system, which effected service on all Counsel of Record.

/s/ Josh Tepfer
One of Plaintiff's Attorneys